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Attorney for Defendant  
JOSE ANGEL SERRANO

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	)	No. 2:05-cr-0179 MCE
	)	
Plaintiff,	)	
	)	STIPULATION AND ORDER VACATING
v.	)	DATE, CONTINUING CASE, AND
	)	EXCLUDING TIME
JOSE ANGEL SERRANO	)	
Defendant.	)	
	)	Date: JUNE 20, 2006
	)	Time: 8:30 a.m.
	)	Judge: Hon. ENGLAND

**IT IS HEREBY STIPULATED** by and between Assistant United States Attorney CAROLYN DELANEY, Counsel for Plaintiff, and Attorney DINA L. SANTOS, Counsel for Defendant JOSE ANGEL SERRANO, that the status conference scheduled for May 16, 2006, be vacated and the matter be continued to this Court's criminal calendar on June 20, 2006, at 8:30 a.m, for status and possible change of plea.

This continuance is requested by the defense in order to permit further client consultation concerning finalization of the plea agreement and further negotiations with the prosecution regarding finalization of the plea agreement.

1       **IT IS FURTHER STIPULATED** that time for trial under the Speedy  
2 Trial Act, 18 U.S.C. § 3161 et. seq. be tolled pursuant to §  
3 3161(h)(8)(A) & (B)(iv), Local code T-4 (time to prepare), and that the  
4 ends of justice served in granting the continuance and allowing the  
5 defendant further time to prepare outweigh the best interests of the  
6 public and the defendant in a speedy trial.

7       The Court is advised that all counsel have conferred about this  
8 request, that they have agreed to the June 20, 2006 date, and that Ms.  
9 Delaney has authorized Ms. Santos to sign this stipulation on her  
10 behalf.

11       **IT IS SO STIPULATED.**

13 Dated: May 12, 2006

14       /S/ Dina L. Santos  
15       DINA L. SANTOS  
16       Attorney for Defendant  
17       JOSE ANGEL SERRANO

16 Dated: May 12, 2006


17       /S/ Carolyn Delaney  
18       CAROLYN DELANEY  
19       Assistant United States Attorney  
20       Attorney for Plaintiff

21       **O R D E R**

22       **IT IS SO ORDERED.**

23       By the Court,

24 Dated: May 19, 2006

25         
26       MORRISON C. ENGLAND, JR.  
27       UNITED STATES DISTRICT JUDGE  
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